

Thank you for your comment, Christopher Lish.

The comment tracking number that has been assigned to your comment is OSTS2012D50165.

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OSTS 2012 Draft PEIS

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Attachment: 120427_draft_oil-shale_tar-sands_peis.doc

Comment Submitted:

Please see attached comment.

Friday, April 27, 2012

Draft OSTs PEIS
Argonne National Laboratory
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Subject: Please Choose Alternative 3: Don't Use Public Lands for Oil-Shale or Tar-Sand Development -- Draft Programmatic Environmental Impacts Statement for Oil Shale and Tar Sands Development

Dear Secretary Salazar,

Thank you for this opportunity to comment on the Bureau of Land Management's (BLM) 2012 Draft Programmatic Environmental Impacts Statement (PEIS) for Oil Shale and Tar Sands development on our nation's public lands. As a citizen concerned about the increasing impacts of climate change on our nation's health and welfare, I am appalled by the notion of allowing oil companies to develop tar sands and oil shale projects on public lands. It would pollute our land, air, and water, and exacerbate climate change. Endemic, threatened, and endangered species would be lost. I urge you and your agency to select Alternative 3 in the Final EIS.

"Our duty to the whole, including to the unborn generations, bids us to restrain an unprincipled present-day minority from wasting the heritage of these unborn generations. The movement for the conservation of wildlife and the larger movement for the conservation of all our natural resources are essentially democratic in spirit, purpose and method."

-- Theodore Roosevelt

I thank the Obama administration for its work to roll back dangerous provisions enacted by the corrupt Bush administration that would have opened 670,558 acres of public land for oil shale leasing and 430,686 acres for tar sands leasing in Utah alone, including some of the state's most iconic wilderness-quality lands such as White Canyon and Fiddler Butte. In the recently-released Draft PEIS, the BLM's preferred alternative (Alternative 2b) proposes to make 252,181 acres available for shale leasing in Utah and 91,045 acres available for tar sands leasing. **This is still too much!** The BLM's proposal would leave these lands open for speculative development that could foul public lands, air and water quality, and result in large quantities of greenhouse gases.

"Our government is like a rich and foolish spendthrift who has inherited a magnificent estate in perfect order, and then has left his fields and meadows, forests and parks to be sold and plundered and wasted."

-- John Muir

Between global warming, rampant extinction, and a quickly drying Colorado River—problems that oil-shale and tar-sand development would only worsen—it's hard to imagine a less prudent use of our public lands. I therefore oppose any action by the

BLM to continue or to authorize any new oil-shale or tar-sand development on public land, or create or continue land-use allocations that would allow for such uses in the future. I am very disappointed that the Draft PEIS did not include an alternative that does not in any way endorse additional public-land use for this unproven industry.

“Wilderness is a resource that can shrink but not grow—the creation of new wilderness in the full sense of the word is impossible.”

-- Aldo Leopold

The magnitude of potential impacts to the West’s delicate public lands and shrinking water resources is simply too great to grant unfettered access to the oil industry in these areas. It is foolhardy and irresponsible to open up public lands to these industries—particularly before we even understand the magnitude their footprint. Public lands should be held in trust for American citizens, not for private profits.

“As we peer into society's future, we—you and I, and our government—must avoid the impulse to live only for today, plundering for our own ease and convenience the precious resources of tomorrow. We cannot mortgage the material assets of our grandchildren without risking the loss also of their political and spiritual heritage. We want democracy to survive for all generations to come, not to become the insolvent phantom of tomorrow.”

-- Dwight D. Eisenhower

At a time of record-breaking temperatures, debilitating droughts, devastating floods, and increasingly severe weather, we simply cannot afford to increase our reliance on higher-carbon fuels. Producing oil from both tar sands and oil shale generates significantly more carbon pollution than production of conventional petroleum. Granting the oil industry access to our public lands to lock-in production of these types of fuels is simply incompatible with a sustainable energy future that will mitigate the impacts of climate change.

“I think America will have come to maturity when it will be possible to erect somewhere in the United States a great bronze marker which will read:

“Beneath these lands which surround you there lies enormous mineral wealth. However, it is the judgment of the American people, who locked up this area, that these lands shall not be disturbed, because we wish posterity to know that somewhere in our country, in gratitude to nature, there was at least one material resource that we could let alone.”

-- Freeman Tilden

Large-scale development of oil shale and tar sands on our public lands would also come at a major cost to the West’s land, wildlife, air quality, and water resources. Already subject to significant oil and gas developments, some of the areas assessed in the Draft PEIS suffer extremely poor air quality. And although very little is known about the impacts of oil shale production, even the low-end of the estimates of how much water it would consume is significant: a 2010 study by the Government Accountability Office demonstrated the range of estimated water impacts from 5 to 25 barrels of water consumed for every barrel of oil produced—a toll the West simply cannot afford.

“Every man who appreciates the majesty and beauty of the wilderness and of wild life, should strike hands with the farsighted men who wish to preserve our material resources, in the effort to keep our forests and our game beasts, game-birds, and game-fish--indeed, all the living creatures of prairie and woodland and seashore--from wanton destruction. Above all, we should realize that the effort toward this end is essentially a democratic movement.”

-- Theodore Roosevelt

The federal public land overlying oil shale resources in Utah, Colorado, and Wyoming is also some of the best fish and wildlife habitat in the West, and outdoor recreation and tourism are huge economic drivers for the region, whereas oil shale is currently producing no jobs and no revenue, and the Congressional Budget Office confirmed that it is not expected to produce significant revenues through 2022. These federal public lands are also home to the largest remaining big game migration in the lower 48 states. It is the “mule deer factory.” It provides important habitat for sage-grouse, a species that is on the brink. All of the proposed extraction methods for oil shale will have devastating impacts on wildlife and on other values of these public lands, including clean air and water. We must protect this sustainable economy by making smart decisions based on sound information.

“Then I say the Earth belongs to each generation during its course, fully and in its own right, no generation can contract debts greater than may be paid during the course of its own existence.”

-- Thomas Jefferson

I ask that you carefully evaluate and fully disclose the serious impacts of all new energy required for oil-shale and tar-sand production and its potentially devastating impacts to our climate, as well as the threat it poses to wildlife, special-status, threatened, and endangered species, and to our water, air, and communities. For all the reasons stated above, I am strongly opposed to opening up our public lands to oil shale or tar sands development.

“A thing is right when it tends to preserve the integrity, stability, and beauty of the biotic community. It is wrong when it tends otherwise.”

-- Aldo Leopold

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,
Christopher Lish
Olema, CA